

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF EASTERN PENNSYLVANIA

| | | |
|---------------------|---|-----------------------|
| In Re: |) | Case No: 21-11650-PMM |
| |) | |
| Sandra Anne Wagner, |) | |
| |) | Chapter 13 |
| Debtor. |) | |

DEBTOR'S RESPONSE TO THE CHAPTER
13 STANDING TRUSTEE'S MOTION FOR DISMISSAL

AND NOW comes the Debtor, Sandra Anne Wagner, by and through her undersigned counsel, with this Response to the Chapter 13 Standing Trustee's Motion for Dismissal and avers as follows:

The Debtor admits to falling behind on her trustee payments. The Debtor anticipates receiving her tax refund in the next two weeks in the amount of \$2,240.00. The Debtor requests a two (2) week adjournment and she will pay her arrears upon receipt of her tax refund.

WHEREFORE, the Debtor respectfully requests the Court enter an Order DENYING the Trustee's motion to dismiss.

Dated: April 19, 2022

Respectfully Submitted,

/s/ James DiMaggio
James DiMaggio, Esq.
Attorney ID No. 319713
1000 Maplewood Drive
Suite 202
Maple Shade, NJ 08052
Tel. (856) 831-7119
Fax (856) 282-1090
Attorney for the Debtor

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CERTIFICATE OF SERVICE

I, Amy J. Truss, Paralegal to James DiMaggio, with Keaveney Legal Group, 1000 Maplewood Dr., Suite 202, Maple Shade, NJ 08052 do hereby certify that on April 19, 2022, service of a true and correct copy of the attached pleadings including the Debtor's Response to the Chapter 13 Standing Trustee's Motion for Dismissal, and attachments thereto, was delivered by first class mail and/or electronic filing to the below named interested parties:

| Name and Address | Mode of Service |
|--|------------------------|
| Scott Waterman, Trustee ECFMail@ReadingCH13.com | Electronically |
| US Trustee USTPRegion02.PH.ECF@usdoj.gov | Electronically |
| Sandra Wagner, Debtor | Electronically |
| Rebecca Ann Solarz Attorney for The Bank of New York Mellon bkgroup@kmlawgroup.com | Electronically |
| Apex Asset Management 2501 Oregon Pike Suite 102 Lancaster, PA 17601-4890 | USPS First Class |
| CB of America Attn: Bankruptcy Po Box 5013 Hayward, CA 94540-5013 | USPS First Class |

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|--|------------------|
| Collection Center Attn: Bankruptcy Po Box 8666 Lancaster, PA 17604-8666 | USPS First Class |
| Finance System, Inc. Attn: Bankruptcy 5703 National Road East Richmond, IN 47374-2619 | USPS First Class |
| Lancaster Gen Hospital c/o Creditors Bankruptcy Service Po Box 800849 Dallas, TX 75380-0849 | USPS First Class |
| Penn Credit Attn: Bankruptcy PO Box 988 Harrisburg, PA 17108-0988 | USPS First Class |
| The Bank of New York Mellon c/o Select Portfolio Servicing, Inc. Po Box 65250 Salt Lake City, UT 84165-0250 | USPS First Class |

Date: April 19, 2022

/s/ Amy J. Truss
Amy J. Truss